

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

CRAIG SANFORD, et al.)	
)	
Plaintiffs.)	
)	Civil Action No. 1:10-cv-00940-GBL-IDD
v.)	
)	
SCG INTERNATIONAL, LLC, et al.)	
)	
Defendants.)	
)	

**THE SANFORDS' MEMORANDUM IN RESPONSE TO THE DEFENDANTS'
MOTION IN LIMINE TO PREVENT ANY REFERENCES TO OR ADMISSION OF AN
ALLEGED GIULIANI REPORT**

The Plaintiffs Craig Sanford and Mary Jo Sanford ("The Sanfords"), by counsel, hereby state the following in response to the Defendants' Motion in Limine to Prevent any References to or Admission of an Alleged Giuliani Report:

The Sanfords have no opposition and take no position with respect to this motion by the Defendants. The Sanfords have no intention of using the alleged Giuliani Report as an exhibit at trial during their case-in-chief. The Sanfords also have no intention of referencing it in testimony during their case-in-chief.

The Sanfords respectfully leave it to this Court to rule on the Defendants' *Motion in Limine* to exclude any reference to or the admission of the alleged Giuliani Report.

CRAIG SANFORD
MARY JO SANFORD

/s/

J. Chapman Petersen, Esq., VSB #37225
Jason F. Zellman, Esq., VSB # 77499
SUROVELL ISAACS PETERSEN & LEVY PLC
4010 University Drive, Suite 200
Fairfax, VA 22030
Telephone 703.251.5400
Facsimile 703.591.9285
jpetersen@sipfirm.com
jzellman@sipfirm.com

Certificate of Service

I hereby certify that on this 3rd day of August, 2011 I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following individuals. Additionally, I transmitted the foregoing by facsimile to the following individuals:

Brent L. VanNorman, Esq.
Hunton & Williams LLP
500 East Main Street, Suite 1000
Norfolk, VA 23510
bvannorman@hunton.com
Counsel for Mr. Smith and SCG International, LLC

/s/

J. Chapman Petersen, Esq., VSB #37225
Jason Zellman, Esq., VSB #77499
Counsel for the Sanfords
Surovell Isaacs Petersen & Levy PLC
4010 University Drive, 2nd Floor
Fairfax, VA 22030
Telephone: 703-251-5400
Facsimile: 703-591-9285
jpetersen@sipfirm.com
jzellman@sipfirm.com